

1 Scott A. Kronland (SBN 171693)
2 Stacey M. Leyton (SBN 203827)
3 Eileen B. Goldsmith (SBN 218029)
4 Danielle E. Leonard (SBN 218201)
5 Robin S. Tholin (SBN 344845)
6 James Baltzer (SBN 332232)
7 ALTSHULER BERZON LLP
8 177 Post Street, Suite 300
9 San Francisco, CA 94108
10 Tel. (415) 421-7151
11 Fax (415) 362-8064
12 skronland@altber.com
13 sleyton@altber.com
14 egoldsmith@altber.com
15 dleonard@altber.com
16 rtholin@altber.com
17 jbaltzer@altber.com

18 *Attorneys for Plaintiffs*

19 [Additional Counsel not listed]

20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

29 AMERICAN FEDERATION OF
30 GOVERNMENT EMPLOYEES, AFL-CIO;
31 AMERICAN FEDERATION OF STATE
32 COUNTY AND MUNICIPAL EMPLOYEES,
33 AFL-CIO, et al.,

34 Plaintiffs,

35 v.
36 UNITED STATES OFFICE OF PERSONNEL
37 MANAGEMENT, et al.,

38 Defendants.

39 Case No. 3:25-cv-01780-WHA

40 **PLAINTIFFS' MOTION FOR
41 ADMINISTRATIVE RELIEF TO EXCEED
42 PAGE LIMITATION FOR REPLY IN
43 SUPPORT OF *EX PARTE* MOTION FOR
44 TEMPORARY RESTRAINING ORDER
45 AND ORDER TO SHOW CAUSE**

46 Civil Local Rule 7-11

1 Plaintiffs American Federation of Government Employees, AFL-CIO, *et al.* hereby
 2 respectfully submit this Motion for Administrative Relief, pursuant to Civil Local Rule 7-11, to
 3 exceed the page limitation applicable to Plaintiffs' Reply in Support of *Ex Parte* Motion for
 4 Temporary Restraining Order and Order to Show Cause, which is being filed today. Plaintiffs seek an
 5 additional seven (7) pages for their reply. Plaintiffs' counsel emailed Defendants' counsel to ask
 6 whether they would stipulate to the requested relief, but did not receive a response by time of filing.

7 In support of their request, Plaintiffs provide the following showing of good cause:

8 1. In light of rapidly developing factual circumstances in this case, Plaintiffs have been
 9 collecting additional evidence in support of their Motion for a Temporary Restraining Order, and
 10 require seven additional pages to fully present that that evidence, which is responsive to the new
 11 evidence Defendants filed at 10:19 am today in response to this Court's order of February 25, 2025.

12 2. Plaintiffs have been diligent in drafting their motion and supporting papers by this
 13 Court's deadline of February 26, 2025 at midnight, and have attempted to shorten the length of the
 14 brief as much as possible. However, Plaintiffs require an additional seven (7) pages in order to fully
 15 address the complex issues in this case for the Court, particularly given the condensed briefing
 16 schedule for this motion.

17 3. Given Plaintiffs' timeline to draft the Reply memorandum, it was not completed until
 18 after 11 p.m. Tholin Dec. ¶2. At 10:23 p.m., Plaintiffs' counsel emailed Defendants' counsel to ask
 19 whether Defendants would stipulate to an extension of seven pages for the reply brief. *Id.* ¶3.
 20 Plaintiffs' counsel did not receive a response before the deadline for filing. *Id.* ¶4.

21 On the basis of the foregoing showing of good cause, Plaintiffs respectfully request this Court
 22 to permit them to file the accompanying Reply in support of the *Ex Parte* Motion for Temporary
 23 Restraining Order and Order to Show Cause of 22 pages.

24 DATED: February 26, 2025

25 Scott A. Kronland
 26 Stacey M. Leyton
 27 Eileen B. Goldsmith
 28 Danielle E. Leonard
 Robin S. Tholin
 James Baltzer
 ALTSCHULER BERZON LLP
 177 Post St., Suite 300

1 San Francisco, CA 94108
2 Tel: (415) 421-7151

3 By: /s/ Danielle Leonard

4 *Attorneys for Plaintiffs*

5 Norman L. Eisen (*pro hac vice forthcoming*)
6 Pooja Chadhuri (SBN 314847)
7 STATE DEMOCRACY DEFENDERS
FUND
8 600 Pennsylvania Avenue SE #15180
Washington, DC 20003
9 Tel: (202) 594-9958
10 Norman@statedemocracydefenders.org
Pooja@statedemocracydefenders.org

11 By: /s/ Norman L. Eisen

12 *Attorneys for Plaintiffs*

13 Rushab Sanghvi (SBN 302809)
14 AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES
15 80 F Street, NW
Washington, DC 20001
16 Tel: (202) 639-6426
17 Sanghr@afge.org

18 By: /s/ Rushab Sanghvi

19 *Attorneys for Plaintiff American Federation of
20 Government Employees (AFGE)*

21
22
23
24 Teague Paterson (SBN 226659)
25 Matthew Blumin (*pro hac vice forthcoming*)
26 AMERICAN FEDERATION OF STATE, COUNTY,
AND MUNICIPAL EMPLOYEES
27 1625 L Street, N.W.
Washington, D.C. 20036
28 Tel: (202) 775-5900
TPaterson@afscme.org

1 MBlumin@afscme.org
2
3 By: /s/Teague Paterson

4 *Attorneys for Plaintiff American Federation of State
5 County and Municipal Employees (AFSCME)*
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28